

June 30, 2016

Vermont Public Service Board
112 State Street
Montpelier, VT 05620 -2701

Re: Response to Comments Received Regarding Temporary Sound-Level Standard

Dear Public Service Board Members,

Please accept these comments in response to comments submitted to the Public Service Board (PSB) by Green Mountain Power, Renewable Energy Vermont, Vermont Environmental Research Associates, and the Vermont Department of Public Service, all of which argue for no change in regulations governing noise standards for industrial wind turbines in Vermont.

It is the obligation of the PSB to adopt standards that are precautionary and protective of the health and welfare of all Vermonters. There is clear evidence that the current standard of 45 dBA has failed to do so. As PSB members, you should be well aware that there are multiple unresolved noise-related complaints awaiting resolution at this time. The PSB's history of failing to resolve complaints in a timely manner has discouraged victims from complaining to the PSB. This is similar to discouraged workers that no longer seek employment. Just as the behavior of discouraged workers does not translate into lower unemployment, the failure of victims to submit complaints to a non-responsive body does not translate into the absence of impacts.

The WHO standards for allowable nighttime noise, referred to by several commenters, were last updated in 2009, based on work conducted prior to 2006. The (WHO) report notes that only below 30dB (outside annual average) are "no significant biological effects observed," and that between 30 and 40dB, several effects are observed, with the chronically ill and children being more susceptible. At levels over 40dB, "Adverse health effects are observed," and "many people have to adapt their lives to cope with the noise at night. Vulnerable groups are more severely affected."

http://www.euro.who.int/_data/assets/pdf_file/0017/43316/E92845.pdf

A great deal of additional data has been accumulated since 2006 that suggests that 35dBA is the level at which complaints subside. Therefore, this is the level that should be adopted for the State of Vermont unless and until such time as evidence for a more protective standard is available.

It is past time for the PSB to stop accepting the self-serving and counter-factual "evidence" presented by representatives of the wind industry and their supporters and adopt noise standards in keeping with those of other New England states and countries around the world that take protection of their populations seriously. This means adopting a standard of no more than 35dBA. Any honest appraisal of Vermont's experience to date with the existing standard of 45dBA would have to conclude that it has failed to protect the health and well-being of Vermonters and scientific evidence confirms that it would do

so even if it were properly enforced.

Sincerely yours,

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